

Section A. Verification Procedures for Factors of Eligibility								
Eligibility Factor	Self-Attestation Accepted without Additional Verification (Y/N)	Self-Attestation Accepted with Post-Eligibility Verification (Y/N)	Electronic Data Source Used (Y/N)	Reasonable Compatibility Standard Used	Specify Reasonable Compatibility Standard for Income	Ask for a Reasonable Explanation from the Individual (Y/N)	Paper Documentation Required from the Individual (Y/N)	Comments
Income*	NO	YES	YES	Both are above, at or below the applicable income standard.  Other (Specify in Comments)	See comments	YES	YES	<p>Two-pronged approach; the State gets employment and unemployment data from the Oklahoma Employment Security Commission (OESC). Therefore, current wage data will have a 5 percent threshold test applied (5% difference between what the individual attests to and what the data source states) and unemployment data will have a 0 percent threshold test applied.</p> <p>While OK is a self attestation State we will check for income post-enrollment and act on inconsistencies as Data Exchange (DX) or other information is provided. Earned income is checked through DX in the quarter after the application or the renewal is made and at the end of the certification period for Reasonable Compatibility in order to perform Passive Renewal. If a member is collecting unemployment , we receive unemployment compensation data weekly.</p> <p>If an individual or family attests income above the threshold for Medicaid, their attestation results in ineligibility for Medicaid and we send for APTC.</p> <p>The State will ONLY require paper if information received from electronic sources are inconsistent with the attestation and are not within the reasonable compatibility threshold if applicable. Will utilize state internal feed with SSA for income at application rather than the Hub.</p>
Residency	NO	YES	YES	N/A	N/A	YES	YES	While Oklahoma accepts attestation of residence, the state also matches against PARIS federal interstate match. OK verifies PARIS at least twice in a year and as needed when working with other states. If residency is called into question such that it would affect the individuals' eligibility, reasonable explanation and/or physical document may be required. Postal returned mail indicators may also trigger a request for updated information from the member.
Age (Date of Birth)	YES	NO	NO	N/A	N/A	NO	NO	Age of applicant is self-attested in Oklahoma. No verification of age is required but may be received incidental to proof of citizenship, SSN, etc.

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Social Security Number **	NO	NO	YES	N/A	N/A	N/A	YES	Paper documentation will only be requested if information received from electronic data sources are discrepant . All measures to obtain the information electronically will be exhausted. State plans to use current SOLQi data feed for verification. State will not be utilizing SSA Hub data at this time.
Citizenship **	NO	NO	YES	N/A	N/A	N/A	YES	Paper documentation will only be requested if information received from electronic data sources are discrepant. All measures to obtain the information electronically will be exhausted. State plans to use current SOLQi data feed for verification. State will not be utilizing SSA Hub data at this time.
Immigration Status **	NO	NO	YES	N/A	N/A	N/A	YES	Paper documentation will only be requested if information received from electronic data sources are discrepant. All measures to obtain the information electronically will be exhausted.
Household Composition	YES	NO	YES	N/A	N/A	YES	YES	Self-attestation will be accepted in many cases, however, Oklahoma has internal systems checks in place to review all applications. If, during the regular application review, it is discovered that a member is on another case, then we will request a reasonable explanation from the member. All measures to obtain the information electronically will be exhausted prior to paper documentation being requested from the member.
Pregnancy ***	YES	NO	NO	N/A	N/A	YES	YES	If it's discovered, through claims, that OK has paid for more than 2 births in a 12 month period and/or paid for sterilization and the person attested to an expectation of the delivery of one child then the state will outreach to the member for an explanation. ONLY if a reasonable explanation can not be provided by the member and electronic data sources have been exhausted will the state request paper documentation.

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Caretaker Relative	YES	NO	YES	N/A	N/A	NO	NO	Self-attestation will be accepted in many cases, however , Oklahoma has internal systems checks in place to review all applications. If, during the regular application review, it is discovered that a member is on another case as a caretaker relative, then we will request a reasonable explanation from the member. All measures to obtain the information electronically will be exhausted prior to paper documentation being requested from the member.
Medicare	NO	YES	YES	N/A	N/A	YES	YES	If inconsistencies are discovered between what the person has reported and electronic data sources, then paper documentation may be requested.
Application for Other Benefits	YES	NO	NO	N/A	N/A	NO	NO	
Other: (Please describe any other eligibility factors in the space below)								

\* States must check electronic data sources determined useful to verify income in accordance with 42 CFR 435.948 but can be done post-enrollment.  
If the information obtained from electronic data sources and the information provided by or on behalf of the individual are both above, at or below the applicable income standard, the State must determine the applicant eligible or ineligible for Medicaid/CHIP. (NOTE: this option is prepopulated for the state and is not an option that can be changed).

\*\* States must follow statute, regulations, and guidance for verification of SSN, citizenship and immigration status including obtaining such information through the federal data services hub if available.

\*\*\* States must accept self-attestation of pregnancy unless they have information that is not reasonably compatible with such attestation.

MAGI-BASED ELIGIBILITY VERIFICATION PLAN  
(Insert Medicaid, CHIP, or Both) Medicaid & CHIP  
State: Oklahoma

## Section B1. Use of Electronic Data Sources

Financial:

Electronic Data Source	Determined Useful (Y/N) <sup>1</sup>	Accuracy Considered (Y/N)	Timeliness Considered (Y/N)	Ability to Access Considered (Y/N)	Age of Data Considered (Y/N)	Comprehensive Considered (Y/N)	Other Criteria Used (Y/N) (Please Describe in Comments section)	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Data Source Used for Post-Enrollment - Frequency Used (e.g. monthly, quarterly)	Comments
1. Internal Revenue Service (IRS)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		The State decided IRS data was not useful because the data was old and the security requirements were too onerous.
2. Social Security Administration (SSA) (SSI, Title II)	YES	YES	YES	YES	YES	NO	NO	NO	YES	YES	Other (specify in comments)	The State already has real time SOLQI connections to SSA for processing SSI/Title XVI and Title II, information therefore, the State will not be pursuing a separate connection to the federal hub at this time. SSA information will be checked annually or post certification.
3. State Wage Information Collection Agency (SWICA)	YES	YES	YES	YES	YES	NO	NO	NO	YES	YES	Other (specify in comments)	Earned income is checked through Data Exchange (DX) in the quarter after the application or the renewal is made and at the end of the certification period for Reasonable Compatibility in order to perform Passive Renewal.
4. State Unemployment Compensation	YES	YES	YES	YES	YES	YES	NO	NO	YES	YES	Other (specify in comments)	If a member is collecting unemployment , we receive unemployment compensation data weekly.
5. State Administered Supplementary Payment Program	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Data consistency issues and real-time connection not established.
6. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Data consistency issues and real-time connection not established.
7. Supplemental Nutrition Assistance Program (SNAP)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Data consistency issues and real-time connection not established.

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8. Temporary Assistance for Needy Families (TANF)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Data consistency issues and real-time connection not established.
9. Office of Child Support Enforcement (OCSE)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Upon further review HCA will not be using child support income data so we have determined this data source not useful.
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		Data source is not available to the Medicaid agency. Would require state law change.
11. Commercial database: (Pease describe any commercial databases in the space below)												
TALX/The Work Number	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		State utilizes Oklahoma Employment Security Commission (OESC), i.e. SWICA. Oklahoma may utilize TALX at a later date.
12. Other: (Please describe any additional electronic data sources in the space below)												

1. The state marked any criterion YES if they were considered in determining the usefulness of the electronic data source; however, the determination of whether the data source was useful/not useful did not rest solely on these criteria.

Section B2. Use of Electronic Data Sources

Non-Financial:

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
1. Social Security Administration (SSA)	YES	YES	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	YES	YES	Other (specify in comments)	The state already has real time SOLQi connections to SSA for processing SSN and Citizenship information therefore, Oklahoma will not be pursuing a separate connection to the federal hub at this time. Medicare information will be checked annually or post certification.  Can be used for age/DOB if necessary
2. Department of Homeland Security (DHS) - SAVE	YES	NO	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	YES	Other (specify in comments)	At time of application or reported changes in immigration status the state will verify in real-time through the Hubs's SAVE service. If Step 1 of SAVE through the Hub does not verify the individual's immigration status, we will call Step 2 and Step 3, if necessary, using our existing data match with SAVE. For SAVE status that can change a check will be done at renewal.

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
3. Vital Statistics	YES	NO	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	Other (specify in comments)	Post enrollment data source used to verify citizenship prior to asking for paper documentation. This is a nightly batch process.  Can be used for age/DOB if necessary
4. Department of Motor Vehicles (DMV)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
5. Temporary Assistance for Needy Families (TANF)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
6. Supplemental Nutrition Assistance Program (SNAP)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
7. Office of Child Support Enforcement	YES	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Other (specify in comments)	OK receives nightly updates of child support non-cooperation data.
8. State General Assistance Programs	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
9. Women, Infants and Children Program (WIC)	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		
10. State Income Tax	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO		

Electronic Data Source	To Be Used (Y/N)	Social Security Number	Citizenship	Immigration Status	Residency	Age/DOB	Pregnancy	Household Composition	Caretaker Relative	Medicare	Application for other Benefits	Other	Data Source Used at Application (Y/N)	Data Source Used at Renewal (Y/N)	Data Source Used Post-Enrollment (Y/N)	If Used for Post-Enrollment Frequency Used (i.e. monthly, quarterly)	Comments
11. Commercial database: <i>(Please describe any commercial databases in the space below)</i>																	

13. Other: <i>(Please describe additional electronic data sources in the space provided below)</i>																	
12. PARIS*	YES	NO	NO	NO	YES	NO	NO	NO	NO	NO	NO	YES	NO	NO	YES	Other (specify in comments)	Oklahoma will continue to conduct data matches through PARIS, bi-annually for residency and to determine if the individual has Medicaid in another state.

\* Under 42 CFR 435.945(d), all State Medicaid eligibility systems must conduct a match with PARIS for Interstate benefit information.  
 If used for other purposes, please indicate in Section D.



Section C . Additional Factors of Eligibility for Separate CHIP						
Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self-Attestation Accepted with Post-Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non-Applicable (N/A)	Comments
1. Applicant does not have other coverage	NO	YES	YES	NO	Must be Applied	The OHCA screens for other third part liability (TPL) coverage through a systematic data match with a state contracted vendor. Member identifying information is shared with the vendor, the vendor searches its databases of past and effective dates for other sources of creditable coverage, and returns results to the state. Also, we ask for the information the during the application. This policy applies to the Medicaid expansion population.
2. Applicant does not have access to affordable ESI	NO	YES	YES	YES		The state internally verifies that the applicant is not enrolled in one of the state sponsored programs. One of those internal checks is to determine if the applicant has ever been in the OHCA's system. The state currently and will continue to only ask for paper documentation as a last resort.
3. When child has had coverage (as applicable to states' waiting period)	NO	YES	YES	NO		The state screens for other third part liability (TPL) coverage through a systematic data match with a state contracted vendor. Member identifying information is shared with the vendor; the vendor searches its databases of past and present effective dates for other sources of creditable coverage, and returns results to the state.
4. Access to public employee coverage	NO	YES	YES	NO		The state internally verifies that the applicant is not enrolled in one of the state sponsored programs. One of those internal checks is to determine if the applicant has ever been in the OHCA's system.
5a. Waiting period exception #1 (describe):					N/A	
5b. Waiting period exception #2 (describe):					N/A	
5c. Waiting period exception #3 (describe):					N/A	

Eligibility Factor	Self-Attestation Accepted without Additional Verification	Self- Attestation Accepted with Post- Enrollment Verification (Y/N)	Electronic Data Source Used (Y/N) <i>If Yes, please describe in comments</i>	Paper Documentation Required from the Individual (Y/N)	Non- Applicable (N/A)	Comments
5d. Waiting period exception #4 (describe):					N/A	
5e. Waiting period exception #5 (describe):					N/A	
5f. Waiting period exception #6 (describe):					N/A	
5g. Waiting period exception #7 (describe):					N/A	
5h. Waiting period exception #8 (describe):					N/A	
5i. Waiting period exception #9 (describe):					N/A	
5j. Waiting period exception #10 (describe):					N/A	
6. Other eligibility factors or exceptions to eligibility factors: <i>(Please describe in the space provided below)</i>						

Section D. Additional Verification Questions

	Question	Response
1	If paper documentation is required when a data source is not available or the information obtained from a data source is not reasonably compatible with the information provided by or on behalf of the individual, briefly describe how the state determined that establishing and using an electronic data source was not effective, considering such factors as cost and program integrity in accordance with 42 CFR 435.952(c):	The OHCA exhausts all electronic data sources available; paper documentation may be requested only if the information received from the electronic data sources is inconsistent with the attestation that would have an impact on eligibility AND/OR a reasonable explanation cannot be obtained from the member. The state utilizes self-attestation with post-enrollment verification for many factors of eligibility and utilizes many back-up data sources when inconsistencies are found from the primary data source used.
2	Please describe how the state uses PARIS?	The OHCA submits a match file twice a year, February and August, to the DOD to conduct an interstate match to determine whether that universe of members receives concurrent benefits in Oklahoma and another state. It is also useful for detecting fraud or improper payment based on residency status.
3	Please indicate (YES) or (NO) if the State intends to request Secretarial approval to solely use alternative data sources for financial verification other than those listed in 42 CFR 435.948 (Numbers 1-8 in Section B-1).	NO

	Question	Response
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and</li> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	N/A
4	<p>Please indicate (YES) or (NO) if the State intends to request Secretarial approval to use a mechanism other than the federal data services hub for information that is available through the hub.</p>	YES
	<p>If (YES), please submit a letter to CMS requesting such approval describing how the the state meets the following requirements:</p> <ol style="list-style-type: none"> <li>1) Reduces administrative costs and burdens on both individuals and the State,</li> <li>2) Maximizes accuracy and minimizes delay,</li> <li>3) Meets the requirements related to confidentiality, disclosure, maintenance and use of information, and</li> <li>4) Promotes coordination with other insurance affordability programs.</li> </ol>	<p>There will be a realtime experience using the state's existing data sources. The batch process will only be used as a backup.</p> <p>OK submitted a letter to CMS requesting to not use the Hub to collect Title II income, SSN, or citizenship verification from SSA, and to use its existing data match with DHS SAVE to complete Steps 2 and 3 of the process if necessary.</p>
5	<p>Describe any additional MAGI-based eligibility verification policies and procedures that have not been covered in this verification plan (optional):</p>	

Section A. Additional Comments

Section B1. Additional Comments

Section B2. Additional Comments

Section C. Additional Comments